

# EXHIBIT D

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA, ) Case No.: 2:17-cr-00072-RFB

Plaintiff,

vs.

VONTEAK ALEXANDER,

Defendant.

**DECLARATION OF DR. HALLEH  
SEDDIGHZADEH IN SUPPORT OF  
RESTITUTION CALCULATIONS FOR  
THERAPUTIC AND MENTAL HEALTH  
SUPPORT AND LOSS OF EARNINGS  
CAPACITY**

1. I am a Forensic Traumatologist and cross-cultural Counter-Trafficking expert working internationally for the past 15 years, specializing in the psychological treatment of torture, complex traumatic stress, and dissociative conditions. With a focus on victims of cross-cultural, coercive, predatory trauma—including survivors of sex and labor trafficking, war, terrorism, gender-based violence, and youth who are vulnerable to indoctrination by violent extremist groups or cults. I have Ph.D. in Clinical Psychology, with specialized training in cross-cultural forensic mental health. I am the founder of ARMAN, a forensic mental health and human rights agency.
2. ARMAN is a multidisciplinary human rights organization that specializes in serving victims of extreme trauma, coercive control, and violence including youth indoctrinated by violent extremist groups, human trafficking victims, war refugees, and victims of gender-based violence. Our work is informed by a network of international trauma experts, law enforcement experts, mental and behavioral health experts, medical and academic researchers and practitioners all of whom have extensive experience treating and working with individuals who have suffered the most extreme forms of torture and trauma. It is from these experiences that ARMAN's culturally adept, multicultural values and holistic approach to healing are founded.

1 ARMAN's mission is to raise the standard of care for those whose needs cannot be met by  
2 traditional mental health facilities both in the U.S. and abroad.

- 3 3. I am submitting this sworn declaration in support of Jane Doe's Restitution Calculations for  
4 trafficking related therapeutic and mental health support and possible loss of earnings  
5 capacity. I was contracted through Justice At Last to provide a virtual trafficking analysis via  
6 phone to Jane Doe to assess and determine elements of exploitation related coercion, abuse  
7 and trauma.
- 8 4. I virtually met with Jane Doe for a total of 70 minutes on August 16, 2021 via phone. I also  
9 reviewed Jane Doe's Impact Statement, as well as her medical and relevant psychological  
10 records produced in this matter, including UCSF Benioff Children's Hospital Records; Alameda  
11 County DCFS Records; Willow Rock; Jane Doe Transcript from 4-16-2016; and Jane Doe's  
12 Forensic Medical Report.
- 13 5. Based on my expertise as a Traumatologist and Human Trafficking Expert, I believe the  
14 diagnosis of Post-Traumatic Stress Disorder (PTSD) as clinically assessed and determined by  
15 Willow Rock Adolescent Psychiatric Center 4/30/2016 as a result of being abducted, sexually  
16 exploited and trafficked at age of 12 by the defendant is accurate, and from Jane Doe's  
17 reported symptoms still a presenting issue to date. I recommend long-term psychiatric  
18 treatment for Jane Doe. From my expertise with child torture victims and child trafficking  
19 victims, they require lifelong care because they deal with short and long-term effects  
20 throughout their lives. In the short-term, Jane Doe currently reports suffering from flashbacks,  
21 insomnia, depression, and anxiety and this has likely contributed to her inability to maintain  
22 gainful employment and lack of motivation to pursue higher education. Over the long-term, it  
23 is possible for her to develop additional trauma-related problems with Socio-economic  
24 challenges, Trust, Forming relationships, Self-confidence and Self-esteem, Concentration,  
25 Learning Disorders, Chronic Fatigue, Emotional Dysregulation, Depressive disorders, Sleep  
26 disorders, Eating Disorders, Substance Misuse, Suicidal ideation, Heightened Cortisol levels  
27 and significant medical and health related issues that can result in Hypertension, Asthma,  
28 Chronic Obstructive Pulmonary Disease, Stroke, Kidney Disease, Obesity, Diabetes, High-blood  
pressure and even Cancer. Future life events such as defendant's eventual release from

1 prison, may also renew old traumas, requiring additional care throughout adulthood. All of  
2 these possible additional trauma-related problems could impact her earning capacity and  
3 contribute to further loss of earnings. My specific conclusions and recommendations for  
4 Jane Doe is as follows:

- 5 6. Based on the records and my meetings with Jane Doe, I concur with her existing diagnosis of  
6 PTSD. Based on my expertise, I believe the PTSD diagnosis is specifically related to her  
7 experiences with the defendant in which she was abducted and sex-trafficked at 12 years of  
8 age.
- 9 7. I recommend intensive individual therapy twice a week for 15 years, followed by a lifetime of  
10 ongoing individual therapy. This would include other forms of trauma therapy not limited to  
11 talk therapy, including art therapy, animal therapy, biofeedback, and EMDR (Eye Movement  
12 Desensitization and Reprocessing). Additionally, some type of case management and  
13 vocational counseling is recommended to support her and help keep her motivated to move  
14 forward with her healing.
- 15 8. Factoring in the level of expertise that would be needed to address the level of trauma of the  
16 PTSD diagnosed by Willow Rock Adolescent Psychiatric Center, I would estimate the  
17 minimum hourly rate would be \$250 per hour.
- 18 9. I declare under penalty of perjury, that the foregoing is true and correct.

19  
20 Executed on this 22<sup>nd</sup> day of August, 2021.

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24 Dr. Halleh Seddighzadeh